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November 11, 2014

VIA ELECTRONIC FILING

Hon. Arlene Rosario Lindsay
United States Magistrate Judge
Long Island Federal Courthouse
814 Federal Plaza
Central Islip, NY 11722-4451

Re: Deserio-Mintz v. C.R. Bard, Inc., et al.
Case No. 2:14-cv-04942-LDW-ARL

Dear Magistrate Lindsay:

We represent the Defendants, C.R. Bard, Inc. and Davol, Inc. in the above action. Pursuant to Fed. R. Civ. P. 26(f)(1), the parties have met and conferred to discuss a discovery plan for this action. The parties have come to agreement and accordingly, pursuant to Fed. R. Civ. P. 26(f)(2) and (3), now jointly submit the proposed discovery plan for the Court's consideration.

If the proposed discovery plan meets with Your Honor's approval, the parties request that the initial conference scheduled for November 19, 2014 be adjourned per the Court's October 28, 2014 Initial Conference Order.

Thank you.

Respectfully submitted,

/s/ Daniel K. Winters
Daniel K. Winters

Enc.

cc: Andres Alonso, Esq.